

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JEFFREY SIMPSON,

Plaintiff,

- v -

JARED CHASSEN et al.,

Defendants.

Case #25-04004 (JMF)

Before the Honorable  
Jesse M. Furman, U.S.D.J.

**NOTICE OF MOTION**  
**UNDER RULE 59(e)**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, all associated papers, and all matters of which the Court may take judicial notice, Plaintiff JEFFREY SIMPSON respectfully will move this Court, before the Honorable Jesse M. Furman, United States District Judge, at the Thurgood Marshall United States Courthouse, located at 40 Foley Square, New York, New York 10007, at a date and time to be determined by the Court, for an Order, pursuant to Federal Rule of Civil Procedure 59(e), granting the following relief:

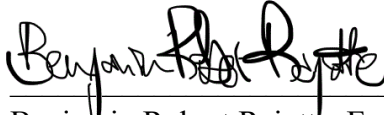
1. Altering or amending the Court's Memorandum Opinion and Order, dated June 27, 2025 (ECF doc. #31) awarding attorneys' fees on the petition of Defendant JARED CHASSEN (ECF docs. #6-13), which was joined by Defendant RECEIVER ERIC M. HUEBSCHER (ECF docs. #14, 16-17), and by Defendant ARCH REAL ESTATE HOLDINGS LLC (ECF docs. #24-26); or
2. In the alternative, extending final adjudication of this matter so as to allow for fuller briefing by the parties on the Court's Memorandum Opinion and Order, following the District Court's forthcoming decision in *In re JJ Arch LLC*, Case #24-08649, which is being heard before the Honorable Jeannette A. Vargas, U.S.D.J., on review of the dismissal of the underlying bankruptcy proceeding, Case #24-10381, before the Honorable John P. Mastando III, U.S.B.J.

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Respectfully submitted,

Dated: July 25, 2025  
Hartford County, Connecticut

MAIDEN LANE LAW GROUP

A handwritten signature in black ink, appearing to read "Benjamin Robert Rajotte", written over a horizontal line.

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*Attorneys for Jeffrey Simpson and JJ Arch LLC*